

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No.: 23-22168-JAD
)	
Jerrold M. Howard)	Chapter 13
Debtor)	
)	Doc. No.:
Jerrold M. Howard)	
Movant)	Filed under Section 362(c)(4)
)	of the Bankruptcy Code
)	
v.)	Hearing Date & Time:
)	November 15, 2023 @ 10:30 A.M.
Allegheny County, Capital One, Capital One Auto)	
Finance, Dept. of Ed/Navient, Duquesne Light,)	
Goehring, Rutter & Boehm, IRS, Jordan Tax Service,)	
Navient, Office of the US Trustee, PNC Bank,)	
Riverview S.D., Santander Consumer USA,)	
SN Servicing Corp., Waste Mgmt. HQ,)	
Weiss Burkardt Kramer and)	
Ronda J. Winnecour, Trustee)	
Respondents)	

**DEBTOR MOTION TO EXTEND THE AUTOMATIC STAY UNDER
SECTION 362 (c)(4) OF THE BANKRUPTCY CODE**

AND NOW comes the Debtor, Jerrold M. Howard, by and through his Attorney, Albert G. Reese, Jr., and files the following Motion to Extend the Automatic Stay:

1. The Debtor is the Movant.
 2. The Debtor filed a Emergency Chapter 13 Petition on October 13, 2023.
 3. The Debtor had one (1) dismissed bankruptcy proceeding in 2019. The Debtor filed for bankruptcy under Chapter 13 on August 2, 2019 at Case No. 19-23061-JAD. This case was dismissed on March 14, 2023 for failure to make payments.
 4. The pending Chapter 13 case Automatic Stay expires on **November 13, 2023.**
- As a result of the prior bankruptcy, the Debtor does not have protection of the Automatic Stay.
5. The Debtor desires to impose the automatic stay as to all his creditors.
 6. The Debtor avers that this current bankruptcy case was filed in good faith for the following reasons:

- a. The Debtor has had a change of circumstances. The Debtor has retired from his previous position as a car sales man where his income was inconsistent because he was paid on a commission basis, now the Debtor is receiving regular monthly social security.
 - b. The Debtor has filed this case in good faith. Debtor has income to fund a Chapter 13 Plan.
7. The Debtor has the ability to successfully complete the Chapter 13 case and has provided Counsel with some of the documentation needed to complete the filing.

WHEREFORE, the Debtor prays that this Honorable Court hear this Motion and enter an Order Extending the Automatic Stay against all creditors until further Order of Court.

Dated: **October 13, 2023**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esq.
Albert G. Reese, Jr., Esquire
PA ID# 93813
The Law Office of
Albert G. Reese, Jr.
640 Rodi Road, 2nd Floor, Suite 2
Pittsburgh, PA 15235
(412) 241-1697(p)